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DEC 10 2007 *aw*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

DEC 10 2007

Kori Taylor

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

07cv6934  
JUDGE NORGLÉ  
MAG. JUDGE SCHENKIER

vs.

Case No: \_\_\_\_\_  
(To be supplied by the Clerk of this Court)

Patrick Firman

David Kirk

Lake County Jail

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

- ☒ **COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983**  
U.S. Code (state, county, or municipal defendants)
- ☐ **COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE**  
**28 SECTION 1331 U.S. Code** (federal defendants)
- ☐ **OTHER** (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Kori Taylor
- B. Date of Birth: December 22, 1984 (12-22-84)
- C. List all aliases: \_\_\_\_\_
- D. Prisoner identification number: L115254
- E. Place of present confinement: Lake County Jail
- F. Address: P.O. Box 38, Waukegan, Illinois, 60079

(If there is more than one plaintiff, then each plaintiff must list his or her name, date of birth, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Patrick Fieman  
 Title: Deputy of Corrections  
 Place of Employment: Lake County Sheriff Correctional Division
- B. Defendant: David Kirk  
 Title: Classification Supervisor  
 Place of Employment: Lake County Sheriff Adult Correctional Division
- C. Defendant: Lake County Sheriff Adult Correctional Division  
 Title: Robert H. Babcox Center  
 Place of Employment: Lake County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Kari Tylon Taylor (Vs.)  
Officer Waterloo. (Case # 07C06644)
- B. Approximate date of filing lawsuit: November 17<sup>th</sup>, 2007 (11-17-07)
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: (N/A)
- D. List all defendants: Officer Waterloo (6226), Officer Johnson  
(1994), Lake County Jail, Sergeant Navarro,  
Lieutenant D. Watten, and Jennifer Witherspoon.
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): United States District Northern District of Illinois  
Eastern Division, (Cook County).
- F. Name of judge to whom case was assigned: (Judge Norgle /  
(Magistrate): Judge Schenkier)
- G. Basic claim made: Failure to provide safe and humane  
treatment to inmate, and Cruel and Unusual  
Punishment.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): These claims are still pending.
- I. Approximate date of disposition: November 26, 2007 (11-26-07)

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

The county of Lake along with the following individuals and entity, in their official and individual capacities failed to provide plaintiff Kori Taylor with a hearing for alleged violations of facility rules, Patrick Firman (Deputy of Corrections) and David Kirk (Classification Supervisor) This is a violation of my fourth (4<sup>th</sup>) Amendment Right, which is Due Process. On or about February 15, 2006 plaintiff was scheduled to be removed from the Punitive Segregation Unit for a previous violation of Lake County Jail facility rules. At approximately 2:30 on or about (2/15/06) plaintiff was informed that he would not be removed from Punitive Segregation, even though his sentence was completed, plaintiff was detained in Punitive Segregation until or about April 30, 2006 (4-30-06) This violates my 8<sup>th</sup> amendment right, (Cruel and Unusual Punishment, and also violates my Inmate Rights, which are:

The Right to safe and humane treatment given with respect impartiality and fairness, and also violates my right to be informed of the rules and procedures that directly effect me within the facility.

(End of Complaint)

## V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want to be awarded with \$1,000.00 (dollars) for each  
day spent in the Segregation Unit due to violations  
of my rights. I want to be awarded with \$1,000,000  
(dollars) for Cevel and Unusual Punishment, Pain and  
Suffering, Mental Anguish, Depression and Stress. Also  
\$1,000,000 (dollars) in Punitive Damages, Lawyer and court Fees.

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

## CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 30<sup>th</sup> day of November, 2007

K. Taylor

(Signature of plaintiff or plaintiffs)

Kori Taylor

(Print name)

L115254

(I.D. Number)

P.O. Box 38

Waukegan, Illinois 60079

(Address)